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**TRANSMITTAL OF 1) RESPONSE TO COMMENTS ON FINAL WORK PLAN FOR
CONTAMINATION DELINEATION AT REMEDIAL UNIT C5; AND 2) REVISED
FIGURE A-14 - PROPOSED SAMPLE LOCATIONS**

02/01/2006
BRAC PMO WEST

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DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1435 FRAZEE ROAD, SUITE 200
SAN DIEGO, CA 92106-4210

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Ser BPMOW.rna/0084
1 February 2006

Mr. Michael Work (SFD-8-1)
U.S. EPA
75 Hawthorne Street
San Francisco, CA 94105

Mr. Tom Lanphar
Department of Toxic Substances Control
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, CA 94710

Mr. Jim Ponton
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear BCT Members:

Enclosure (1) is the Response to EPA Comments on the Final Work Plan for Contamination Delineation at Remedial Unit C5 in Hunters Point Shipyard, San Francisco, California, dated February 1, 2006. Enclosure (2) is the revised sampling location figure included for your information.

If you have questions or comments, please contact Mr. Ryan Ahlersmeyer at (619) 532-0960.

Sincerely,

KEITH FORMAN
BRAC Environmental Coordinator
By direction of the Director

Enclosure (1) Response to EPA Comments on the Final Work Plan for Contamination Delineation at Remedial Unit C5 at Hunters Point Shipyard, San Francisco, California, February 1, 2006.

(2) Revised Figure A-14 "Proposed Sample Locations"

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1 February 2006

Copy to:

Ms. Karla Brasaemle (Hard Copy)
90 New Montgomery Street, Suite 1010
San Francisco, CA 94105

Ms. Amy Brownell (Hard Copy)
1390 Market Street Suite 910
San Francisco, CA 94102

Ms. Dorinda Shipman (Hard Copy)
Treadwell and Rollo
555 Montgomery St., Suite 1300
San Francisco, CA 94111

Mr. Marcos Getchell (Hard Copy)
Four Embarcadero Center, Suite 1700
San Francisco, CA 94111

Ms. Diane Silva (3 Hard Copies)
1220 Pacific Highway
San Diego, CA 92132

Mr. David Wilkens (CD Only)
49 Stevenson Street, Suite 525
San Francisco, CA 94105

Ms. Rona Sandler (CD Only)
City Hall, Room 234
1 Dr. Carlton B. Goodlet Place
San Francisco, CA 94102-4682

Arc Ecology (Hard Copy)
833 Market St., #1107
San Francisco, CA 94103

Ms. Barbara Bushnell (CD Only)

Mr. Phil Burke (CD Only)
155 Grand Ave, Suite 1000
Oakland, CA 94612

**Responses to Regulatory Comments on the
Final Work Plan for Contamination Delineation at Remedial Unit RU-C5,
Hunters Point Shipyard, San Francisco, California**

These responses to comments (RTCs) were prepared to address comments received from Michael Work of the Environmental Protection Agency (EPA) regarding the response to comments, dated December 21, 2005, included as Appendix D of the Final Work Plan for Contamination Delineation at Remedial Unit RU-C5.

EPA Comments

Response to EPA Specific Comment 12: The revised procedure for filling volatile organic analyte (VOA) vials is problematic because volatiles could be lost and preservatives could be diluted if a vial is opened repeatedly to add additional groundwater. It is preferable to discard a vial when there are bubbles and to fill a new vial, but it would also be acceptable to submit the vial "as-is" if there are only 2 or 3 tiny bubbles. If large bubbles form, it may be necessary to submit an unpreserved sample because the preservative may cause a chemical reaction that creates air bubbles. It is not acceptable to repeatedly open and refill a VOA vial. If this proposed procedure is not changed and if vials are opened, this must be noted on field sampling forms and on the Chain of Custody Form. It should be recognized that if vials are topped off, data should be evaluated for consistency with other data from nearby sampling locations and monitoring wells and that it could potentially be rejected. Please delete the portion of the procedure that refers to opening VOA vials and replace it with a decision tree as follows:

- VOA vials may not be opened and refilled.
- If there are only a few tiny bubbles, the sample will be submitted "as-is" to the laboratory.
- If there are large bubbles or significant bubbles, the vial will be discarded and a new, unpreserved sample will be collected.

Please submit replacement pages for Sampling and Analysis Plan (SAP) Sections 2.1.5.3 and 2.1.5.4, item 14.

Response: The suggested method (which is consistent with the Basewide Groundwater Monitoring Plan SAP) will be implemented during the second phase of sampling to be performed in mid-February. Any deviations from the proposed method will be documented on the sampling and chain of custody forms, as suggested. Instead of reproducing replacement pages, these comments and responses will be taken with the SAP into the field and crews will be instructed to follow the suggested methods. In addition, all aspects of field work (deviations, locations, etc) will be documented in the technical memorandum to be developed following the receipt of all project data.

ONE NEW COMMENT

1. The proposed sampling locations on Figure A-14 may not adequately delineate the extent of potential contamination beneath Building 123 because there are no sampling locations within the building. This was discussed with Mr. Ryan Ahlersmeyer, who agreed to move some sample locations from the northeastern area into and south of Building 123. The samples just outside Building 123 to the east and southeast should be collected early in the program so that if contamination is detected, additional locations can be completed in the eastern end of Building 123. If this is not done, a second investigative phase may be necessary. Please revise the program to include potential sampling locations within Building 123.

Response: The groundwater sampling effort is being performed in two phases in order to properly address the project data quality objectives. Specifically, when VOCs are detected at or directly adjacent to the border between Parcel B and C, then the extent of the VOC contamination protruding into Parcel B is to be assessed. Proposed sampling locations depicted on Figure A-14 were tentative and subject to change depending on the results of the first phase of sampling.

Upon review of the first phase results, a revised sampling location figure has been developed and provided with these RTCs. In addition, the second phase sampling locations do include two sampling locations with Building 123, as requested in the comment.